

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION

TRADING PLACES INTERNATIONAL, LLC,        )  
  )  
  )  
  Plaintiff,        )  
  )  
  )  
v.    )    Case No. 6:15-cv-03092-BP  
  )  
  )  
SUMMERWINDS RESORT SERVICES, LLC,        )  
ET AL.,                                        )  
  )  
  Defendants.        )

**STIPULATED MOTION FOR EXTENSION OF DEFENDANTS'  
DEADLINE TO DISCLOSE EXPERT WITNESSES**

COMES NOW Defendants Summerwinds Resort Services, LLC and Stormy Point Village – Phase III Property Owners Association, Inc. (collectively “Defendants”) through their counsel Husch Blackwell LLP, and with the stipulation and consent of counsel for Plaintiff, move this Court to amend its Scheduling Order of August 11, 2016, to extend the deadline for Defendants to disclose expert witnesses to December 30, 2016. In support of their motion, the parties state the following:

1. Pursuant to this Court’s Order of August 11, 2016, Defendants’ current deadline to disclose experts is November 30, 2016.
2. Defendant requires additional time to properly prepare its expert disclosures because (i) Defendants have only recently obtained information from Plaintiff through discovery that is critical to its ability to produce an expert report on Defendant’s alleged damages, and (ii) Defendants are currently scheduled to depose Plaintiff’s expert on November 22<sup>nd</sup>, and will require some time following the deposition to analyze Plaintiff’s expert’s testimony and prepare a rebuttal report. Further, Defendant’s anticipated expert has limited availability and will be

traveling much of the next several weeks, such that Defendants require additional time so that their expert can prepare a proper report.

3. Counsel for Defendants and Plaintiff have consulted and agree to the extension of Defendants' deadline to provide their expert report until December 30, 2016.

4. Accordingly, Defendants request that the deadline for disclosure of their expert witnesses be extended to December 30, 2016, or to such date as is necessary and proper to allow Defendants' experts to prepare opinions for rebuttal and for assessment of Defendants' damages.

5. Extension of Defendants' expert witness disclosure deadline and discovery deadline will not disrupt the trial setting or other scheduled deadlines.

6. This motion is not made for any improper purpose and will support the cause and administration of justice.

WHEREFORE, Defendants Summerwinds Resort Services, LLC and Stormy Point Village – Phase III Property Owners Association, Inc., pray for an order of this Court extending the deadline for Defendants to disclose their expert witnesses to December 30, 2016, and for such other and further relief as the Court deems just under the circumstances.

**HUSCH BLACKWELL LLP**

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the above and foregoing was forwarded this 21<sup>st</sup> day of November, 2016, via the court's electronic notification system:

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